

Janis C. Puracal, OSB #132288
E-mail: jcp@mlrlegalteam.com
Andrew C. Lauersdorf, OSB #980739
E-mail: acl@mlrlegalteam.com
MALONEY LAUERSDORF REINER, PC
1111 E. Burnside Street, Ste. 300
Portland, OR 97214
Telephone: (503) 245-1518
Facsimile: (503) 245-1417

David B. Owens, WSBA #53856, *pro hac vice*
E-mail: david@loevy.com
LOEVY & LOEVY c/o
Civil Rights and Justice Clinic
University of Washington Law School
William H. Gates Hall, Suite 265
PO Box 85110
Seattle, WA 98145-1110
Telephone: (312) 590-5449

Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

NICHOLAS JAMES MCGUFFIN, as an
individual and as guardian *ad litem*, on behalf
of S.M., a minor,
Plaintiffs,

Civil No. 6:20-cv-01163-MTK
(Lead Case)

v.

MARK DANNELS, PAT DOWNING,
SUSAN HORMANN, MARY KRINGS,
KRIS KARCHER, SHELLY MCINNES,
RAYMOND MCNEELY, KIP OSWALD,
MICHAEL REAVES, JOHN RIDDLE, SEAN
SANBORN, ERIC SCHWENNINGER,
RICHARD WALTER, CHRIS WEBLEY,
ANTHONY WETMORE, KATHY WILCOX,
CRAIG ZANNI, DAVID ZAVALA, JOEL D.
SHAPIRO AS ADMINISTRATOR OF THE
ESTATE OF DAVID E. HALL, VIDOCQ
SOCIETY, CITY OF COQUILLE, CITY OF
COOS BAY, and COOS COUNTY,
Defendants.

PLAINTIFFS' EXHIBIT LIST

VIDOCQ SOCIETY,
Cross-Claimant,

v.

MARK DANNELS, PAT DOWNING,
SUSAN HORMANN, MARY KRINGS,
KRIS KARCHER, SHELLY MCINNES,
RAYMOND MCNEELY, KIP OSWALD,
MICHAEL REAVES, JOHN RIDDLE, SEAN
SANBORN, ERIC SCHWENNINGER,
RICHARD WALTER, CHRIS WEBLEY,
ANTHONY WETMORE, KATHY WILCOX,
CRAIG ZANNI, DAVID ZAVALA, JOEL D.
SHAPIRO AS ADMINISTRATOR OF THE
ESTATE OF DAVID E. HALL, VIDOCQ
SOCIETY, CITY OF COQUILLE, CITY OF
COOS BAY, and COOS COUNTY
Cross-Defendants.

NICHOLAS JAMES MCGUFFIN, as an
individual and as guardian *ad litem*, on behalf
of S.M., a minor,
Plaintiffs,

Civil Case No. 3:21-cv-01719-MTK
(Trailing Case)

v.

OREGON STATE POLICE,
Defendant.

Pursuant to the Court's Trial Management Order [Dkt. No. 384], Plaintiffs anticipate
offering following trial exhibits:

EXHIBIT NO.	DESCRIPTION	ADMITTED	RECEIVED	OBJECTION
101	2000-06-28 Lee Report of Traffic Stop			
102	2000-06-28 Zavala Report of Traffic Stop			
103	200-07-05 CCSO, Oswald Found Shoe			
104	2000-07-05 McGuffin Consent to Search			
105	2000-07-05 Polygraph of Nicholas McGuffin			

EXHIBIT NO.	DESCRIPTION	ADMITTED	RECEIVED	OBJECTION
106	2000-07-05 Roadblock Interview of Steinhoff			
107	2000-07-06 CCSO, Zanni, Interview with K. Christopherson			
108	2000-07-06 Dave Hall Affidavit for Search Warrant			
109	200-07-06 OSP Lab Report			
110	2000-07-06 US Bank ATM Pointing North			
111	2000-07-06 Wilcox Handwritten Notes re HIT Meeting			
112	200-07-07 CCSO, Oswald, Lewis receipt			
113	200-07-11 CCSO, Downing, Interview of Alicia Hyatt (Hartwell)			
114	200-07-11 US Bank Covering N. Central			
115	200-07-12 US Bank Covered N. Central			
116	2000-07-17 OSP Lab Report			
117	2000-07-17 Photo of Left Shoe			
118	2000-07-21 Fax to Hall with Gas Records			
119	2000-07-27 Hall Affidavit for Search Warrant			
120	2000-07-31 Cynthia Jones Tip Leah in Phone Booth			
121	200-08-03 Pex Dictated Notes from Scene			
122	2000-08-04 Autopsy Report			
123	2000-08-05 Press Release with body location			
124	2000-08-07 CPD Reaves re Lindegren			
125	2000-08-07 Evidence Log – scene tape highlighted			
126	2000-08-08 Lead Sheet – Mast			

EXHIBIT NO.	DESCRIPTION	ADMITTED	RECEIVED	OBJECTION
127	2000-08-09 Young Report re West			
128	2000-08-10 CPD Shawn Mast file			
129	2000-08-10 Perske Interview of Mast (Redacted)			
130	2000-08-11 Handwritten Poem			
131	2000-08-15 CPD Copy McGuffin Phone Records			
132	2000-08-22 CCSO, Oswald, search shoe location – photo set 1			
133	2000-08-22 CCSO, Oswald, search shoe location – photo set 2			
134	2000-08-27 OSB Lab Report (Criminal Case Ex. 207)			
135	2000-08-27 OSB Lab Report			
136	2000-09-02 Backman Report			
137	2000-09-19 Drawing of Hamilton Location (Redacted)			
138	2000-09-21 Tip Sheet – Richard Bryant			
139	2000-09-25 OSP Lab Memorandum (draft)			
140	2000-xx-xx Messerle Report of Shoe Location			
141	2001-03-21 Property Request			
142	2001-10-03 FSS Report			
143	2001-10-25- US Bank Tape Return			
144	2002-01-21 OSP Lab Report (Criminal Case Ex. 210)			
145	2004-05-27 CSCO, Downing Report			
146	2008-07-17 Example Webley Photo Lineup			

EXHIBIT NO.	DESCRIPTION	ADMITTED	RECEIVED	OBJECTION
147	2008-09-24 Sanborn re Investigation			
148	2009-xx-xx Dannels Operation Plan			
149	2010-01-23 Schwenninger – Case Notes			
150	2010-01-24 CPD Memo re Contact with McGuffins			
151	2010-01-25 Dannels Press Conference			
152	2010-01-29 McNeely Note re DNA and shoes			
153	2010-02-05 Letter from Dannels to Lab re GJ			
154	2010-02-025 McNeely Email Phone Booth and Gas Records			
155	2010-02-27 Email from Webley to Dannels re Lab			
156	2010-03-01 McNeely Nate re Gas and Backman			
157	2010-03-04 OSP Riddle Interview of Steinhoff			
158	2010-03-10 OSP Lab Report			
159	2010-03-15 Hormann to Pat Smith			
160	2010-03-25 OSP Lab Report			
161	2010-03-30 Letter from Dannels to Hormann			
162	2010-05-12 McNeeley Notes on Fraiser To Do List			
163	2010-05-18 McNeely Report re Lindegren			
164	2010-05-19 Email from Dannels to Fraiser			
165	2010-05-19 Handwritten Notes re Hjordis Lindegren			
166	2010-05-19 Webley Report re Hjordis Lindegren (Redacted)			
167	2010-05-19 Wikipedia Printout			
168	2010-05-24 OSP Lab Report re Kia			

EXHIBIT NO.	DESCRIPTION	ADMITTED	RECEIVED	OBJECTION
169	2010-05-25 CPD, Dannels Interview of D. Mason			
170	2010-05-25 CPD, Dannels Interview of Damon Mason (Recording)			
171	2010-06-11 CPD, Dannels, Adams' Email to Dannels re Zalvala			
172	2010-06-26 Interview of Kristen Steinhoff			
173	2010-06-30 CCSO, Zanni, re Richard Walter			
174	2010-07-03 McNeely Email re Bartley			
175	2010-07-06 Grand Jury Subpoena to Bertrand			
176	2010-07-21 Grand Jury Subpoena I – Alicia Hyatt			
177	2010-07-21 Handwritten Notes of Interview			
178	2010-07-21 Webley (CPD) Interview of Alicia Hyatt (Redacted)			
179	2010-08-21 Grand Jury Subpoena II – Alicia Hyatt			
180	2010-08-24 Riddle Email re Gun			
181	2010-10-15 Transcript of ABC New 20/20			
182	2011 Kip Oswald walking to where he found the shoe			
183	2011 Discovery Log from Criminal Case			
184	2011-04-06 Microtrace Report			
185	2011-12-03 Blue to McNeely re Disciplinary Interview			
186	2011-12-19 Investigative Report re McNeely DPSST Revocation			
187	2011-12-27 Dufner to McNeely re Discipline			

EXHIBIT NO.	DESCRIPTION	ADMITTED	RECEIVED	OBJECTION
188	2011-xx-xx Vidocq Synopsis (Sealed)			
189	2012-01-03 Email from Blue to Dufner re McNeely getting people to change story			
190	2014-01-23 DPSST Memo on McNeely Revocation			
191	2019-12-17 Order on Motion to Dismiss			
192	2019-12-17 Release Video Nick and Parents			
193	2020-02-28 Transcript of ABC News 20/20			
194	Cards from S.M. in County Jail			
195	CCDA Brady List			
196	CPD Dannels Case Summary for Vidocq			
197	Criminal Discovery Bates 3247			
198	Freeman Investigation Organization Chart			
199	Prosecutor's Exhibit List			
200	Karcher ID of Body Location			
201	2000-07-06 Notes from HIT Meeting			
202	2000-06 Graduation Card to Nick			
203	Photo (Maul) W. 4th & N. Elm			
204	Photo (Maul) June 29, 2025, 10.17.27 pm			
205	Photos – 2000-07 CPD Photo of Nick McGuffin			
206	Photos – 2000-07-06 Blue Mustang			
207	Photos – 2000-07-17 Left Nike Shoe			
208	Photos – 2000-07-28 Maroon Thunderbird			

EXHIBIT NO.	DESCRIPTION	ADMITTED	RECEIVED	OBJECTION
209	Photos – 2000-08-03 Lee Valley Road Scene			
210	Photos – 200-08-04 Autopsy			
211	Photos – 2010 McNeely and Lindegren			
212	Photos – Freeman House			
213	Photos – Hwy. 42 and 42S			
214	Photos – Hwy. 42 and CFN			
215	Photos (Maul) Credit Union			
216	Photos (Maul) Fast Mart			
217	Photos (Maul) Hunters			
218	Photos (Maul) McKays			
219	Photos (Maul) N. Central & E. 10th			
220	Photos (Maul) N. Central & Fairview			
221	Photos (Maul) Time Lapse by High School			
222	Photos (Maul) June 29, 2025, 9.27.22 to 9.43.58 pm			
223	Photos (Maul) June 29, 2025, 9.50.32 to 10.07.45 pm			
224	Photos of Nick and Leah			
225	Photos in Prison			
226	Video (Maul) Time Lapse			
227	Video (Maul) June 29, 2025, 9.25.17 pm (start)			
228	Video (Maul) June 29, 2025, 9.29.25 pm			
229	Video (Maul) June 29, 2025, 9.30.40 pm			
230	Video (Maul) June 29, 2025, 9.34.37 pm			
231	Video (Maul) June 29, 2025, 9.35.24 pm			
232	Video (Maul) June 29, 2025, 9.40.20 pm			
233	Video (Maul) June 29, 2025, 9.43.42 pm			
234	Video (Maul) June 29, 2025, 9.50.41 pm			

EXHIBIT NO.	DESCRIPTION	ADMITTED	RECEIVED	OBJECTION
235	Video (Maul) June 29, 2025, 9.56.14 pm			
236	Video (Maul) June 29, 2025, 10.00.14 pm			
237	Video (Maul) June 29, 2025, 10.07.48 pm			
238	Video (Maul) June 29, 2025, 10.17.30 pm (end)			
239	1994 CCSO Policy			
240	Certificate of Innocence			
241	Frasier Dep Ex 2 (for identification purposes only)			
242	Frasier Dep Ex 4			
243	Frasier Dep Ex 5			
244	Fraiser Dep Ex 6 (for identification purposes only)			
245	Fraiser Dep Ex 7 (for identification purposes only)			
246	Fraiser Dep Ex 10			
247	Frasier Dep Ex 11 (for identification purposes only)			
248	Frasier Dep Ex 12			
249	Frasier Dep Ex 13			
250	Frasier Dep Ex 14			
251	Frasier Dep Ex 15			
252	Frasier Dep Ex 16			
253	Frasier Dep Ex 21			
254	Frasier Dep Ex 22			
255	Frasier Dep Ex 23			
256	Frasier Dep Ex 24			
257	Frasier Dep Ex 25			
258	Frasier Dep Ex 26			
259	Frasier Dep Ex 27			
260	Frasier Dep Ex 29 (for identification purposes only)			
261	Frasier Dep Ex 30			
262	Hormann Dep Ex 1 (for identification purposes only)			
263	Hormann Dep Ex 5			
264	Hormann Dep Ex 13			
265	Hormann Dep Ex 16			
266	Hormann Dep Ex 17			
267	K. McGuffin Dep Ex 1			

EXHIBIT NO.	DESCRIPTION	ADMITTED	RECEIVED	OBJECTION
268	K. McGuffin Dep Ex 2			
269	K. McGuffin Dep Ex 3			
270	K. McGuffin Dep Ex 4			
271	K. McGuffin Dep Ex 5			
272	K. McGuffin Dep Ex 6			
273	Krings Dep Ex 2			
274	Krings Dep Ex 3			
275	Krings Dep Ex 4			
276	Krings Dep Ex 9			
277	Krings Dep Ex 11			
278	McNeely Dep Ex 1			
279	McNeely Dep Ex 2 (for identification purposes only)			
280	McNeely Dep Ex 4 (for identification purposes only)			
281	McNeely Dep Ex 14			
282	McNeely Dep Ex 23			
283	McNeely Dep Ex 24			
284	McNeely Dep Ex 26			
285	McNeely Dep Ex 27			
286	Reaves Dep Ex 5 (for identification purposes only)			
287	Reaves Dep Ex 6			
288	Reaves Dep Ex 20			
289	Reaves Dep Ex 23 (for identification purposes only)			
290	Riddle Dep Ex 1			
291	Riddle Dep Ex 5			
292	Riddle Dep Ex 6			
293	Riddle Dep Ex 7			
294	Riddle Dep Ex 9			
295	Riddle Dep Ex 10			
296	Riddle Dep Ex 24 (video)			
297	Riddle Dep Ex 25 (for identification purposes only)			
298	Riddle Dep Ex 26 (video)			
299	Webley Dep Ex 1			
300	Webley Dep Ex 3 (for identification purposes only)			
301	Webley Dep Ex 4 (for identification purposes only)			
302	Webley Dep Ex 5 (for identification purposes only)			

EXHIBIT NO.	DESCRIPTION	ADMITTED	RECEIVED	OBJECTION
303	Webley Dep Ex 6			
304	Webley Dep Ex 8			
305	Webley Dep Ex 9			
306	Webley Dep Ex 11			
307	Webley Dep Ex 22 (video)			
308	Webley Dep Ex 23 (video)			
309	Webley Dep Ex 24 (video)			
310	Webley Dep Ex 26 (video)			
311	Webley Dep Ex 27 (video)			
312	Wilcox Dep Ex 3			
313	Wilcox Dep Ex 4			
314	Wilcox Dep Ex 6			
315	Wilcox Dep Ex 7			
316	Wilcox Dep Ex 8			
317	Wilcox Dep Ex 9			
318	Wilcox Dep Ex 11			
319	Wilcox Dep Ex 13			
320	Wilcox Dep Ex 15			
321	Wilcox Dep Ex 16			
322	Wilcox Dep Ex 18			
323	Wilcox Dep Ex 19			
324	Wilcox Dep Ex 20			
325	Wilcox Dep Ex 25			
326	Zavala Dep Ex 3			
327	Zavala Dep Ex 4			
328	Zavala Dep Ex 13			
329	Zavala Dep Ex 15			
330	Zavala Dep Ex 16			
331	Zavala Dep Ex 17			
332	2000-08-04 HIT Notes			
333	2000-08-19 HIT Notes			
334	200-09-25 Memo Wilcox to HIT Team re DNA			
335	2009-10-13 HIT Notes			
336	2010-10-27 HIT Notes			
337	2010-01-05 HIT Notes			
338	2010-01-20 HIT Notes			
339	2010-01-23 HIT Notes			
340	2010-01-28 HIT Notes			
341	Pre Text to Nick			
342	Photos (Maul) Denny's Pizza			
	Map – Key Locations			

EXHIBIT NO.	DESCRIPTION	ADMITTED	RECEIVED	OBJECTION
	Map – Map of Freeman Sightings			
	Map – Overview of Shoes and Body Site			
	Map – Overview of Shoes and Body v. McGuffin House			
	Map – Timeline of McGuffin Sightings			

Plaintiffs reserve the right to rely on additional documents for the purpose of impeachment and to offer additional demonstratives as necessary. Plaintiffs also reserve the right to offer additional exhibits in rebuttal at trial. Plaintiffs further reserve the right to rely on exhibits listed on the Defendants' exhibit list. Plaintiffs specifically reserve the right to make objections to exhibits at trial.

DATED: July 7, 2025

MALONEY LAUERSDORF REINER PC By <u>/s/Janis C. Puracal</u> Janis C. Puracal, OSB #132288 E-Mail: jcp@mlrlegalteam.com Andrew C. Lauersdorf, OSB #980739 E-Mail: acl@mlrlegalteam.com	LOEVY & LOEVY By <u>/s/David B. Owens</u> David B. Owens, WSBA #53856 E-Mail: david@loevy.com <i>Pro hac vice</i>
---	---

CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2025, the foregoing PLAINTIFFS' TRIAL EXHIBITS was served on the following parties at the following address by sending to them a true copy thereof via the method indicated below:

Robert E. Franz, Jr. Sarah R. Henderson Law Office of Robert E. Franz, Jr. PO Box 62 Springfield, OR 97477 rfranz@franzlaw.comcastbiz.net shenderson@franzlaw.comcastbiz.net <i>Attorneys for Defendants</i> <i>City of Coquille, City of Coos Bay, Coos</i> <i>County, Craig Zanni, Chris Webley, Eric</i> <i>Schwenninger, Sean Sanborn, Ray McNeely,</i> <i>Kris Karcher, Pat Downing, Mark Dannels,</i> <i>Kip Oswald, Michael Reaves, David Zavala,</i> <i>Anthony Wetmore, Shelly McInnes</i>	Jesse B. Davis Kristen Hoffmeyer Oregon Department of Justice 100 SW Market Street Portland, OR 97201 jesse.b.davis@doj.state.or.us kristen.hoffmeyer@doj.state.or.us <i>Attorneys for Defendants Oregon State</i> <i>Police, John Riddle, Susan Hormann,</i> <i>Mary Krings, Kathy Wilcox</i>
Anthony R. Scisciani III Kelsey L. Shewbert Meredith A. Sawyer Lisa Lear HWS Law Group 101 SW Main Street, Suite 1605 Portland, OR 97204 ascisciani@hwslawgroup.com kshewbert@hwslawgroup.com msawyer@hwslawgroup.com llear@hwslawgroup.com <i>Attorneys for Defendant Vidocq Society</i>	Eric S. DeFreest Luvaas Cobb 777 High Street, Ste. 300 Eugene, OR 97401 edefreest@luvaascobb.com Laura E. Coffin Coffin Law 541 Willamette Street, Ste. 211 Eugene, OR 97401 lauracoffin@coffin.law <i>Attorneys for Defendant Richard</i> <i>Walter</i>

☒ by electronic means through the Court's ECF System on the date set forth above.

MALONEY LAUERSDORF REINER PC

By /s/Janis C. Puracal
Janis C. Puracal, OSB #132288
E-Mail: jcp@mlrlegalteam.com

Attorneys for Plaintiffs